

San Francisco Bay Area Organizations  
(Media Alliance, et al.)

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, D.C. 20554

Re: MM Docket No. 99-25

Dear Ms. Dortch:

The undersigned are all representatives of San Francisco Bay Area organizations with an interest in encouraging locally-produced media. Now more than ever there is a demand for local, community-owned radio stations that could serve our local neighborhoods and ethnically diverse populations. That is why we support the FCC's current Notice of Proposed Rulemaking to establish channel floors to ensure there are LPFM channels, as consistent with the Local Community Radio Act.

We realize that if the current pending translator applications in the Bay Area all are processed, there will be no channels for local organizations to apply for come an official FCC LPFM filing window. Of the 38 translator applications we counted around the Bay Area in MX's, 25—or 66%—were submitted by national satellite-relayed radio networks. Another 7—or 18%—appeared to be from entities that have been granted translators in the past and have re-sold them for profit. Thus roughly 84% of the pending translator applications would be used for purposes that the FCC never intended them to be used for. The rest were submitted by entities that already own radio channels.

The highest use for unused radio channels in the Bay Area would be for local neighborhoods and underrepresented groups who have no access to media and not incumbent broadcasters. Any processing solution for the pending translators needs to take into account the needs of the community, setting aside an acceptable number of LPFM channels for local organizations to apply for.

Sincerely,

Tracy Rosenberg, Media Alliance  
Jen Gilomen, Bay Area Video Coalition  
Truc Nguyen/Abra Jeffers, KZSU 90.1 FM Stanford  
Susan Galleymore, Alameda Community Radio  
Adam Fong, Other Minds Inc.  
Jon Raskin, Count Rova:Arts  
Elisabeth Beaird, Circuit Network/San Francisco Electronic Music Festival  
Matt Davignon, Outsound  
Best Dominique, San Francisco Friends of Chamber Music

Wille and Nary Ratcliff, San Francisco BayView Newspaper  
Josh Wilson, Newsdesk.org  
Damin Esper, Friends of KUSF